

EXHIBIT 31

Deposition of
Jason W. Beaman, D.O., M.S., M.P.H., FAPA
September 30, 2021

Dillard
vs.
City of Springdale



Jason W. Beaman, D.O., M.S., M.P.H., FAPA

**Dillard vs.
City of Springdale**

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF ARKANSAS
3 FAYETTEVILLE DIVISION

4 JILL DILLARD, JESSA SEEWALD, JINGER) Case No.
5 VUOLO, and JOY DUGGAR) 5:17-CV-05089-TLB
6 Plaintiffs,)
7 vs.)
8 CITY OF SPRINGDALE; WASHINGTON COUNTY;)
9 KATHY O'KELLEY; ERNEST CATE; RICK HOYT;)
10 STEVE ZEGA; BAUER PUBLISHING COMPANY,)
11 L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA)
12 GROUP, INC.; BAUER, INC; HEINRICH BAUER)
13 NORTH AMERICA, INC; BAUER MEDIA GROUP)
14 USA, LLC; and DOES 1-10, inclusive,)
15 Defendants.)
16 _____)

17 DEPOSITION OF JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA
18 via Zoom videoteleconference
19 Thursday, September 30, 2021

20 REPORTED BY: Derek L. Hoagland
21 CSR No. 13445
22 Job No. 10089281

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15 Defendants.)
16 _____)

17 Deposition of JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA,
18 taken before Derek L. Hoagland, a Certified Shorthand
19 Reporter for the State of California, commencing at
20 9:09 a.m., Thursday, September 30, 2021, via Zoom
21 videoteleconference.
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1 to the eight domains. It makes comments on certain
2 domains, but I don't believe I go through each of the
3 eight domains.

4 **Q. Okay. 1(a) says:**

5 "An individual must have one symptoms of
6 Criteria A, which is exposure to actual or threatened
7 death, serious injury, or sexual violence. Disclosure
8 of being sexually abused by a brother is not established
9 as a component of a criteria."

10 **Do you see that?**

11 **A. I do.**

12 **Q. What does the term "sexual violence" mean?**

13 **A. It is -- I take it to mean that it's assaulting**
14 **another person in regards to a sexual nature, the**
15 **physical assault of someone with the desire for sexual**
16 **gratification.**

17 **Q. And if someone experiences sexual violence or**
18 **re-experiences sexual violence, does that qualify as**
19 **meeting one of the symptoms of criteria A?**

20 **A. The DSM does not say re-experience. It says**
21 **that an individual is exposed to sexual violence.**

22 **Q. What does exposed mean?**

23 **A. That they have had sexual violence perpetrated**
24 **upon them.**

25 **Q. If someone re-experiences sexual violence, would**

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1 that be being exposed to sexual violence?

2 A. It would be -- I'm sorry.

3 Can you repeat your question?

4 Q. Sure. If someone re-experiences sexual
5 violence, is that tantamount to experiencing sexual
6 violence?

7 A. Well, they experience the sexual violence to
8 begin with, so it would be an extenuation of the sexual
9 violence that they initially had.

10 Q. How traumatic is re-experiencing sexual
11 violence?

12 A. That certainly depends on the individual and the
13 circumstances regarding that assault.

14 Q. The criteria in Section A says:
15 "Exposure to actual or threatened," and it goes
16 on to say, "sexual violence."

17 Do you see that?

18 A. I do.

19 Q. How would you compare re-experiencing sexual
20 violence to exposure to actual or threatened sexual
21 violence?

22 A. I would find it to be an extenuation of the
23 sexual violence.

24 Q. What do you mean when you say an extenuation of
25 the sexual violence?

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1 A. That someone is sexually assaulted and there's
2 trauma associated with that, and if they reexperience
3 that through reminders or something like that, it is an
4 extenuation of the sexual violence that they had. It's
5 a -- it's part of that initial sexual assault.

6 Q. What is the definition of sexual trauma, if you
7 know? And, frankly, we can put it up on the screen. I
8 don't mean to -- this doesn't need to be a memory
9 contest. I don't want to be unfair. Let's do that.
10 Let me withdraw the question.

11 We are going to put something up on the screen,
12 an exhibit. Hang on. It's going to take me a minute to
13 find my copy of this exhibit.

14 All right. I will represent to you that we have
15 put up the definition of sexual trauma as found in the
16 American Psychological Association Dictionary of
17 Psychology.

18 Do you see that?

19 A. I do.

20 Q. Do you know what the American Psychological
21 Association Dictionary of Psychology is?

22 A. No.

23 Q. Okay. Well, we'll go forward anyways.

24 Do you see in the American Psychological
25 Association Dictionary of Psychology that the definition

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1 of sexual trauma is:

2 "Any disturbing experience associated with
3 sexual activity. Rape, incest and other sexual
4 experiences may be causes of sexual trauma in older
5 children and adults. It is one of the most common
6 causes of posttraumatic disorders and disassociative
7 disorders."

8 Do you see that?

9 A. I do.

10 Q. Would you agree that sexual trauma is one of the
11 most common causes of posttraumatic disorders and
12 disassociative disorders?

13 A. Yes.

14 Q. Does the term "sexual violence" include incest?

15 A. I would -- I mean, I think -- that's kind of a
16 tricky term. Incest is, I think, broadly defined as
17 sexual relations between relatives, and that can be
18 under a lot of different circumstances. I would think
19 that unwanted sexual contact by a brother would be
20 incest, and that would also be sexual violence.

21 Q. You would agree that unwanted sexual touching by
22 a brother, such as what happened in this matter, each of
23 these girls qualifies as both sexual violence and sexual
24 trauma?

25 A. Yes.

1 Q. Okay. Is it common for victims of incest to
2 disassociate, avoid, or suppress painful thoughts and
3 feelings surrounding the incest and become reawakened at
4 a later time when a new trauma occurs?

5 A. I don't know of any prevalent studies to say if
6 it is common or how often it happens. I would agree
7 that that is a recognized phenomenon.

8 MR. LEACH: Okay. We're going to take our last
9 break, ten minutes, and then we'll come back and we'll
10 finish up. Thank you, Doctor.

11 (A recess transpires.)

12 BY MR. BLEDSOE:

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REPORTER'S CERTIFICATE

STATE OF CALIFORNIA) ss.

I, DEREK L. HOAGLAND, CSR #13445, State of California,
do hereby certify:

That prior to being examined, the witness named in the
foregoing proceeding was by me sworn to testify to the
truth, the whole truth and nothing but the truth;

That said proceeding was taken down by me by stenotype
at the time and place therein stated and thereafter
transcribed under my direction into computerized
transcription.

I further certify that I am not of counsel nor attorney
for nor related to the parties hereto, nor am I in any
way interested in the outcome of this action.

Further, that if the foregoing pertains to
the original transcript of a deposition in a federal
case, before completion of the proceedings, review of
the transcript [X] was [] was not requested.

In compliance with section 8016 of the Business and
Professions Code, I certify under penalty of perjury
that I am a certified shorthand reporter with license
number 13445 in full force and effect.

Witness my hand this October 15, 2021.


DEREK L. HOAGLAND, CSR #13445